DEPARTMENT OF THE NAVY
OFFICE OF THE ASSISTANT SECRETARY
(MANPOWER AND RESERVE AFFAIRS)
1000 NAVY PENTAGON
WASHINGTON, D.C. 20350-1000

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Mr. Robert L. Stephenson II, M.P.H.
Director, Division of Workplace Programs, CSAP
5600 Fishers Lane, Rockwall II, Suite 815
Rockville, MD 20857

Dear Mr. Stephenson:

The Department of the Navy supports the Substance Abuse and Mental Health Services Administration's proposals to establish uniformity among all laboratories and require specimen validity testing. This is also an important step to bring the Mandatory Guidelines in line with the reporting options on the Federal Custody and Control Form. We concur with the revisions to the Mandatory Guidelines for Federal Workplace Drug Testing Programs. However, our comments are included in enclosure (1).

If you have any questions, please call Ms. Sheeler Kowalewski, (202) 764-0759,

Sincerely,

David J Welch

BETTY S. WELCH
Deputy Assistant Secretary of
the Navy (Civilian Personnel/
Equal Employment Opportunity)

Enclosure (1)

Department of the Navy
Comments to the Proposed Revisions to the
Mandatory Guidelines for Federal
Workplace Drug Testing Programs.

Subpart B, Section 2.5. This section contains very precise testing information. The terms in this section, specifically spectrophotometric and colorimetric tests, should have further explanations detailing what is entailed in this type of testing. These terms should be defined in Subpart A, Section 1.2 Definitions.

Subpart B. Section 2.1(c). To alleviate donor concerns this section should specifically state the requirements for the disposal of urine, i.e. "poured down the drain within five days of reporting the negative result."

Subpart B, Section 2.2 and 2.6(e)(2). The 72 hour timeframe allowed for the donor to request a retest is insufficient. Donors should be given the opportunity to have retests of their specimens anytime after notification from the Medical Review Officer (MRO), notification from the agency, and any time during third party hearings. Agencies should also have the opportunity to request a retest not subject to time limits.

Subpart B, Section 2.6(g). This section specifically directs the MRO to report a non-reconfirmed result to the designated Health and Human Services regulatory office. However, it does not establish MRO reporting requirements to the agency. The MRO should be reporting this result to the agency in writing.